

4. State of Residence and Citizenship of each Plaintiff (including any Plaintiff in a representative capacity) at time of filing of Initial Complaint

Illinois

5. State of Residence and Citizenship at the Time of Implantation

Illinois

6. District Court and Division in which personal jurisdiction and venue would be proper absent direct filing.

United States District Court of the Southern District of Illinois

7. Defendants (Check Defendants against whom Complaint is made):



A. Ethicon, Inc.



B. Johnson & Johnson

8. Basis of Jurisdiction



Diversity of Citizenship (28 U.S.C. § 1332(a))



Other: _____

- A. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 11-13

B. Other allegations of jurisdiction and venue:

N/A

9.

Date(s) Plaintiff was Implanted with Physiomesh (list date of each implant surgery, where applicable, on separate line)	Hospital(s) where Plaintiff was implanted with Physiomesh (include City and State of Hospital)	Implanting Surgeon(s)
01/23/2012	Barnes-Jewish Hospital; St. Louis, MO	Douglas Schuerer, MD

10. Counts in the Master Complaint brought by Plaintiff(s):

- ☒ Count I – Strict Product Liability – Defective Design
- ☒ Count II – Strict Product Liability – Failure to Warn
- ☒ Count III – Strict Product Liability – Manufacturing Defect
- ☒ Count IV – Negligence
- ☒ Count V – Consumer Protection Laws (Please identify applicable State Consumer Protection law(s) and state any additional facts and legal basis for application of State Consumer Protection law(s) in this case)

815 Ill. Comp. Stat. 505/1 through 505/12 Consumer Fraud and Deceptive Business Practices Act

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- ☒ Count VI – Gross Negligence
 - ☐ Count VII – Loss of Consortium
 - ☒ Count VIII – Punitive Damages
 - ☒ Count IX – Discovery Rule, Equitable Tolling/Estoppel (Please state any additional facts and legal basis for Discovery Rule and Tolling below)
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☐ Other Count(s) (Please state factual and legal basis for other claims not included in the Master Complaint below):

☒ Jury Trial is Demanded as to All Counts

☐ Jury Trial is NOT Demanded as to Any Count

s/ Katelyn E. Richardson

Attorney(s) for Plaintiff

Address, phone number, email address and bar information:

TX Bar No. 24093040

Johnson Law Group

2925 Richmond Ave., Suite 1700

Houston, TX 77098

Telephone: (713) 626-9336

Facsimile: (832) 862-6671